REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested.

Specification

The title of the invention has been objected to as allegedly not being descriptive. In response, the title has been amended to "Method And Apparatus For Coalescing Two Or More Transaction Requests". It is respectfully submitted that this amended title is descriptive of the claimed subject matter.

35 USC § 101

Claims 1-4, 6, and 8-11 have been rejected under 35 USC 101 as allegedly being directed to non-statutory subject matter. These rejections are respectfully traversed. Notwithstanding, claims 1 and 8 have been amended to clarify that the methods pertain to transferring data within a computer system and include using a computer for coalescing two or more transfer requests into a second data transfer. As a result, the steps defined in the claims could not be carried out as merely mental processes, and as such, comprise statutory subject matter.

Claim Objections

Claims 7, 18, and 25 were objected to as allegedly being multiple dependent claims dependent on other multiple dependent claims. This rejection is respectfully traversed. Each of claims 7, 18, and 25 are dependent on single previous claims and are not multiply dependent. Notwithstanding, each of the claims have been amended to define gathering performance statistics without reference to other claims.

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35 USC § 112

Claims 10 and 20-26 have been rejected under 35 USC § 112, second paragraph as allegedly being indefinite. Claim 10 has been amended to depend upon claim 9 and claim 20 has been amended to depend on claim 19.

35 USC § 102

Claims 1-6, 8-17, 19-24, and 26 have been rejected under 35 USC § 102(a) as allegedly being anticipated by Guineau. These rejections are respectfully traversed.

Claim 1 defines, inter alia, a method including coalescing two or more transfer requests into a second data transfer. Claim 9 defines, inter alia, a method including coalescing two or more transfer requests into an additional data transfer. Claim 13 defines, inter alia, an article comprising a machine-readable medium that stores machine-executable instructions for transferring data that cause a machine to combine two or more transfer requests into a second data transfer. Claim 19 defines, inter alia, an apparatus for coalescing transfer requests that comprises a processor that executes the instructions to combine two or more transfer requests into a second data transfer.

Guineau fails to disclose coalescing or otherwise combining of two or more transfer requests within a data transfer as defined in any of claims 1, 9, 13, and 19. Guineau describes the use of buckets which are histogram intervals that represent the range of I/O sizes possible for a system (see, inter alia, Guineau col. 5, lines 64-66). Guineau states that preferred bucket sizes are 3-7 blocks; although any size bucket may be used (see, inter alia, Guineau col. 5, lines 66-68). In order to determine the predominant I/O command size, the histogram bucket having the greatest number of entries during a given

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cycle is identified (see, inter alia, Guineau col. 6, lines 1-8). The command size is then used to vary a depth of a command queue (see, inter alia, Guineau claim 1).

The buckets of Guineau are statistical measurements which may be used to determine queue depths. Such buckets do not suggest data transfers that have two or more combined data transfer requests. Moreover, Guineau does not even suggest coalescing / combining data transfer requests in the manner defined by claims 1, 9, 13, and 19.

Accordingly, claims 1, 9, 13, and 19 and their respective dependent claims should be allowable.

Claim 3 and 21 define, inter alia, determining that there are pending transfer requests to coalesce before releasing the second data transfer. Guineau does not disclose such a determination. Rather, Guineau discloses a determination of the number of entries within a given bucket.

Accordingly, claims 3 and 21 and their respective dependent claims should be independently allowable.

Claims 8 and 26, define, inter alia, that the second transfer request is stored on a pending list, the second transfer request is not addressed adjacent to the first transfer request address, and a third transfer request is coalesced with the first and second transfer requests into the second combined data transfer, the third transfer request being adjacent to the first and second transfer requests.

As described above, Guineau does not disclose combining data transfer requests. As a result, Guineau also does not disclose any arrangement in which transfer requests are addressed in an adjacent matter.

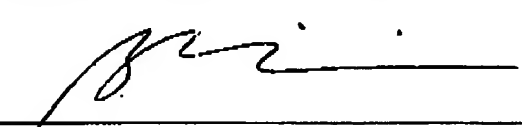Accordingly, claims 8 and 26 should be independently allowable.

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Concluding Comments

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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